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Attorneys for Defendant, Counterclaim
Plaintiff and Third-Party Plaintiff UBS AG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LETIZIA MARTINEZ DE GONZALEZ, as
administratrix and executrix of the Estate of
Emilio Martinez Manautou, as Trustee of the
Emilio Martinez Manautou Trust, and as
Trustee of the EMM Trust,

Plaintiff-Counterclaim Defendant,

- against -

07 Civ. 7462 (RJS)

UBS AG and UBS TRUSTEES LTD.,

Defendants-Counterclaim Plaintiff,

and

UBS AG,

Third-Party Plaintiff,

- against -

ROBERT J. REGER, JR. and
THELEN, REID, BROWN, RAYSMAN &
STEINER, LLP,

Third-Party Defendants.

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RULE 26(a)(1) DISCLOSURE BY DEFENDANT, COUNTERCLAIM
PLAINTIFF AND THIRD PARTY PLAINTIFF UBS AG

Defendant, Counterclaim Plaintiff and Third Party Plaintiff UBS AG (“UBS AG”) makes the following initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

Preliminary Statement

This initial disclosure is based upon information reasonably available to UBS AG as of this date. Because UBS AG has just begun to conduct discovery, the matters stated herein are necessarily limited. By making this disclosure, UBS AG does not represent that it is now identifying every person or document having or containing information that UBS AG may use to support its claims and UBS AG reserves the right to amend, supplement or correct this disclosure.

By making this disclosure, UBS AG does not waive its right to object to the production of any document on the basis of any attorney-client privilege, work product doctrine or on the grounds of lack of relevancy, undue burden or other valid objection. The disclosures contained herein are also made without waiver of UBS AG’s rights (1) to object on the grounds of competency, privilege, relevancy, hearsay, or any other proper ground to the use of any such information for any purpose, in whole or in part, in any subsequent stage or proceeding in this action or any other action and (2) to object on any and all grounds, at any time, to any other discovery proceeding involving or relating to the subject matter of these disclosures.

Rule 26(a)(1) Disclosures

(a) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

At this time, UBS AG states that the following individuals may have information which UBS AG may use to supports its defenses, counterclaims and third party claims:

Thomas Baranzelli
former Director at UBS AG
St. Johannis-Vorstadt 47
4056 Basel
Basel-Stadt, Switzerland

Ruedi Burri
Managing Director, UBS Wealth Management
UBS International Inc.
101 Park Avenue
New York, New York

Kevin Condon
Director Wealth Management
UBS AG

Isidro Ferrer
Formerly on the Mexico desk at UBS AG
1420 Third Avenue
Apt. 5FN
New York, New York 10028

Felicia Gomez
Director, Wealth Planning
UBS AG

Luz Gonzalez
Formerly an assistant on the Mexico desk
UBS AG

Lorenzo Muller
Former Associate Director Private Investors & Asset Management at UBS AG
Birkenstrasse 12
6330 Cham
Zug, Switzerland

Alex Oberli
Executive Director, Wealth Management
UBS AG

Richard O'Neill
Director, Operations
UBS AG

Eduardo Ramirez
Executive Director, Private Banking
UBS AG

Maria-Elena Robayo
Formerly an assistant on the Mexico desk
UBS AG

Alfredo Roth
Former Relationship Manager at UBS AG
487 Hoyt Street
Darien, Connecticut 068120

Marissa Weinberger
Account Director
UBS AG

Don Yeisley
Former Director, Wealth Management at UBS AG
30 Shelby Road
East Northport, New York 11731

Subject of Information

Dr. Martinez' accounts with UBS; Dr. Martinez' intentions and instructions; Dr. Martinez' sophistication as an investor.

Robert J. Reger, Jr.
Thelen Reid Brown Raisman & Steiner LLP
875 Third Avenue
New York, New York 10022

Douglas F. Allen, Jr.
Thelen Reid Brown Raisman & Steiner LLP
875 Third Avenue
New York, New York 10022

Subject of Information

Scope of representation of Dr. Martinez; performance or lack thereof of fiduciary duty and duty of care to Dr. Martinez; Dr. Martinez' intention in setting up accounts with UBS;

Dr. Martinez' trusts; Dr. Martinez' assets and sophistication; circumstances regarding Dr. Martinez' termination of Reger as co-trustee and attorney.

Josefa Sicard-Mirabal
c/o USCIB
1212 Avenue of the Americas
New York, New York 10036

Subject of Information

Scope of representation of Dr. Martinez; performance of or lack thereof of fiduciary duty and duty of care to Dr. Martinez; Dr. Martinez' intention in setting up accounts with UBS; Dr. Martinez' trusts; Dr. Martinez' assets and sophistication

Hal Webb, Esq.
Cantor & Webb P.A.
Brickell Bay Office Tower, Suite 2908
1001 Brickell Bay Drive
Miami, Florida 33131

Subject of Information

Receipt by Dr. Martinez of independent legal tax planning advice.

Letizia Martinez de Gonzalez
c/o Anderson & Ochs LLP
61 Broadway, Suite 2900
New York, New York 10006

Jorge Torres Gonzalez
Volcan No. 10
Col. Pedregal Mexico
Mexico D.F. 01900

Georgina Martinez Viuda de Blasquez

Luis Gerardo Martinez Cardenas

Subject of Information

Dr. Martinez' accounts with UBS, the EMM Trust, the Emilio Martinez Manautou Trust.

(b) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

1. Account statements and other account records of UBS for accounts maintained by Dr. Martinez, including records pertaining to the opening of said accounts, account applications, signature cards, risk analysers, asset summaries, investment management agreements, personal client profiles, portfolio management agreements and general terms and conditions.
2. Correspondence between Dr. Emilio Martinez Manatou and UBS
3. UBS internal correspondence regarding Dr. Martinez' accounts
4. Documents from Letizia Martinez to UBS AG regarding Dr. Martinez's accounts
5. Corporate documents regarding Leluge Investments PTE Ltd. and documents regarding the Leluge Settlement
6. Correspondence and documents from Thelen, Reid & Priest LLP regarding Dr. Martinez's accounts and trusts, including trust agreements and amendments thereto.
7. Correspondence and documents from The Chase Manhattan Private Bank regarding Dr. Martinez's accounts and assets
8. Documents from Merrill Lynch regarding Dr. Martinez's accounts and assets
9. Documents and correspondence from Cantor & Webb P.A. regarding Dr. Martinez

All such documents are located at UBS AG.

(c) a computation of, or a description by category of damages claimed by the disclosing party, making available for inspection and copying under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Plaintiff-counterclaim defendant Letizia Gonzlaez is liable to UBS AG for expenses, including attorney's fees and costs arising out of this action.

To the extent it is determined that UBS AG is liable to plaintiff-counterclaim defendant, then plaintiff-counterclaim defendant is liable to UBS AG in an amount to be determined at trial.

To the extent it is determined that UBS AG is liable to plaintiff-counterclaim defendant, then third party defendants are liable to UBS AG in an amount to be determined at trial.

(d) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse to satisfy the judgment.

Insurance policies by a person carrying on an insurance business – not applicable.

With respect to indemnification, see indemnification provision in terms and conditions of account, which will be produced by UBS AG.

Dated: New York, New York
January 16, 2008

HANDLER & GOODMAN LLP

By: Arthur M. Handler
Arthur M. Handler
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Attorneys for Defendant, Counterclaim
Plaintiff and Third-Party Plaintiff UBS AG

CERTIFICATE OF SERVICE

I, Robert S. Goodman, certify that a copy of the annexed Rule 26(a)(1) disclosure by defendant, counterclaim plaintiff and third party plaintiff UBS AG was served on counsel for the parties in this action at the addresses set forth below by electronic mail through the Court's electronic filing system this 16th day of January, 2008:

Mitchel H. Ochs, Esq.
ANDERSON & OCHS, LLP
Attorneys for Plaintiff-Counterclaim Defendant
61 Broadway, Suite 2900
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David Elsberg, Esq.
QUINN EMANUEL URQUHART
OLIVER & HEDGES LLP
Attorneys for Third-Party Defendants
51 Madison Avenue, 22nd Floor
New York, New York 10010



Robert S. Goodman